

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ANN REGAN,

Plaintiff,

v.

SCHINDLER ELEVATOR
CORPORATION,

Defendant.

Case No.: 1:16-CV-10576-GAO

DEFENDANT'S MOTION TO DISMISS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Local Rule 7.1, and this Court's Order of March 30, 2016, Defendant Schindler Elevator Corporation hereby moves to dismiss the complaint with prejudice for the reasons stated in the accompanying memorandum.

Respectfully submitted,

/s/ John B. Johnson

John B. Johnson

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Dated: April 12, 2016

Counsel for Defendant
Schindler Elevator Corporation

CERTIFICATE OF SERVICE

I, H. Christopher Bartolomucci, hereby certify that pursuant to Local Rule 5.4(C), this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). Notice was also sent to the plaintiff's attorney at his e-mail address which is mlongo@dennerlaw.com on April 12, 2016.